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Attorneys for Hankook Tire America Corp.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	:
	:
SEARS HOLDINGS CORPORATION, <i>et al.</i> ,	:
	:
Debtors.	:
	:
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Chapter 11
Case No. 18-23538-rdd
(Jointly Administered)

DECLARATION OF SAMARA BUCKNER, HANKOOK TIRE AMERICA CORP.

I, Samara Buckner, declare the following to be true and correct under penalty of perjury.

1. I am over the age of 18, and I have personal knowledge of the statements in this Declaration.

2. I am employed by Hankook Tire America Corp. ("Hankook") as AR/Credit Specialist, Accounts Receivable and Credit, America HQ, and I have held that position since May 6, 2018.

3. Among my responsibilities as AR/Credit Specialist, Accounts Receivable and Credit, America HQ, I am responsible for tracking and collecting accounts receivable and credits for the Sears, Roebuck & Co. ("Sears") account, with several other employees.

4. According to Hankook's records, as of October 15, 2018, Sears owed Hankook \$1,043,026.82 in unpaid invoices for purchases made and goods delivered under the Supply Agreement for which Sears had not paid. The invoices relate to purchases that were made during

the approximate period of March 2018 to October 15, 2018. A spreadsheet identifying the unpaid invoices is attached as Exhibit A.

5. The \$1,043,026.82 is still outstanding and unpaid by Sears.

6. Hankook occasionally does business with Hana Financial, Inc. ("Hana"), an unrelated third party. According to Hana's website, <https://www.hanafinancial.com/factoring>, Hana provides the following services to customers: purchase order and trade finance; factoring services; and credit protection.

7. Typically, when Hana factors invoices for Hankook, Hankook's customers pay Hana for any amounts owed to Hankook for factored invoices.

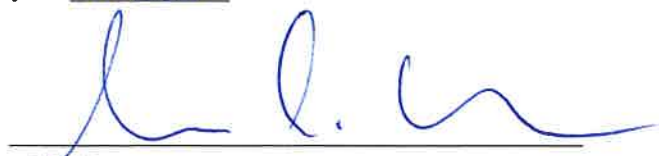
8. At least for 2018 and 2019 thus far, Hankook did not use any Hana services in relation to its Sears account.

9. Attached hereto as collective Exhibit B are true and correct copies of three invoices issued to Sears on August 19, 2016, July 27, 2018, and August 30, 2018, respectively. Each invoice contains Hankook's Nashville address. Based on the account history, these are examples of the hundreds of invoices Hankook issued to Sears each year from 2016 - 2018.

10. To my knowledge, Hankook did not receive any notices of pleadings filed, orders entered, or notices generated in the Sears bankruptcy case.

FURTHER, DECLARANT SAITH NOT.

Executed on this the 1 day of October 2019.



Samara Buckner